

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In Re:	:	
	:	
LORRAINE E. EWING and	:	
WILLIAM EWING, JR.,	:	CHAPTER 13
	:	
	:	
DEBTORS.:	:	BANKRUPTCY NO. 19-13281-MDC
	:	
	:	
	:	

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**CERTIFICATE OF NO OBJECTION TO  
MOTION OF DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC FOR  
RELIEF FROM THE AUTOMATIC STAY TO PROCEED WITH *IN REM* REMEDIES  
ON THE PERSONAL PROPERTY COMMONLY KNOWN AS THE TIMESHARE  
INTEREST POINTS: 4500, INTIAL USE YEAR, 2009**

The undersigned hereby certifies that he is aware of no formal or informal objection or response to the Movant's Motion for Relief from the Automatic Stay to Proceed with In Rem Remedies on the Personal Property Commonly Known as the Timeshare Interest 4500 Points with Initial Use Year, 2009 (Docket No. 32) (the "Motion"), filed by counsel to Diamond Resorts on August 26, 2019. He has reviewed the Court's docket and no objection to the Motion appears thereon.

Then notice of the Motion established September 12, 2019 as the deadline (Docket No. 33) (the "Objection Deadline") for receipt of objections to the Motion, and no extension of the Objection Deadline was granted.

Accordingly it is respectfully requested that the Court enter the proposed form of order filed with the Motion, a copy of which order (modified only to reflect the docket numbers of the related documents) is attached hereto as Exhibit A.

Date: September 16, 2019

/s/ Douglas Leavitt, Esquire  
Douglas Leavitt, Esquire  
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Attorney for Diamond Resorts

# Exhibit A

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In Re:	:	
	:	
LORRAINE E. EWING and	:	
WILLIAM EWING, JR.,	:	CHAPTER 13
	:	
	:	
DEBTORS:	:	BANKRUPTCY NO. 19-13281-MDC
	:	
	:	
	:	

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**ORDER**

**AND NOW**, this      day of                      , 2019, upon motion of Diamond Resorts U.S. Collection Development, LLC, (the “Movant”) for Relief from the Automatic Stay from the Automatic Stay to Proceed with In Rem Remedies on the Personal Property Commonly known as the Timeshare Interest 4500 Points with Initial Use Year, 2009 (the “Motion”) and after proper notice and opportunity for a hearing notice, it is

**ORDERED**, that the Automatic Stay of all proceedings, as provided under Section 362 of the Bankruptcy Code, 11 U.S.C. 362, is modified with respect to the Debtors’ interest in the Vacation Club and the Association (as more fully defined in the Motion) to allow the Movant (including its successors and assigns) to proceed with its *in rem* remedies only; and it is

**FURTHER ORDERED**, that Relief granted by this Order shall survive the conversion of this bankruptcy case to a case under any other Chapter of the Bankruptcy Code.

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**MAGDELINE D. COLEMAN  
CHIEF U.S. BANKRUPTCY JUDGE**

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